

ESTTA Tracking number: **ESTTA402569**

Filing date: **04/07/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91196580
Party	Defendant Torridred Inc.
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Date	04/07/2011
Attachments	NBC30438 04-07-2011(2).pdf (4 pages)(132399 bytes) NBC30438 Cert 4 7 2011.pdf (1 page)(18659 bytes)

LINKEDIN CORPORATION, a Delaware §
corporation,

§ Opposition No.: 91196580

V.

Mark: LINKEDNETS. LINKING
NETWORKS. LINKING PEOPLE.

Reg. No.: 77/883,243

Published: May 25, 2010

TORRIDRED INCORPORATED, a Texas §
corporation,

Applicant

Applicant TorridRed Incorporated (“TorridRed Inc.”), through its undersigned counsel, hereby provides the following disclosures under Federal Rule of Civil Procedure 26(a)(1) and Trademark Rule 2.120. The initial disclosures are based on information reasonably available to TorridRed Inc. as of the date of the initial disclosures. Fed. R. Civ. P. 26(a)(1). TorridRed Inc. reserves the right to supplement, alter, or amend these initial disclosures as discovery progresses and as further information becomes available through its ongoing investigation or discovery. Furthermore, TorridRed Inc. reserves the right to supplement, alter, or amend these initial disclosures at appropriate intervals as provided for in Federal Rule of Civil Procedure 26(e)(1). Supplemental disclosures will be made to the extent that they are not mooted by future discovery responses or have not otherwise been made known to Applicant during the discovery process or in writing.

By making these initial disclosures, TorridRed Inc. is not waiving its right to object to the production of such documents, or testimony of such witnesses, on any ground, including, without limitation: (1) on the basis of privilege or work product protection; (2) on the ground that the information sought is not relevant to the subject matter of Opposition No. 91196580 (the “Opposition”) involving application Serial No. 77/883,243 (the “LINKEDNETS MARK”) and LinkedIn Corporation’s (“LinkedIn”), U.S. Registration Nos. 3,074,241 and 3,074,242 (the LINKEDIN Marks”), and is not reasonably calculated to lead to the discovery of admissible evidence; and (3) on the ground that the information sought is not sufficiently relevant to justify the burden or expense of production. Further, TorridRed Inc. is not making a representation that it has identified every document, tangible thing, or witness that may possibly be relevant to this proceeding. These disclosures represent a good faith effort to identify information that TorridRed Inc. reasonably believes is called for by Federal Rule of Civil Procedure 26(a)(1).

I. KNOWLEDGEABLE INDIVIDUALS (FED. R. CIV. P. 26(a)(1)(A)(i)).

Subject to the qualifications set forth above, the following list identifies individuals likely to have discoverable information that TorridRed Inc. may use to support its claims:

Individual/Entity	Contact Information	Subject(s) of Information
Pratima Rao	Founder and CEO of LinkedNets	Selection, adoption and proposed use of the LINKEDNETS Mark.

Michael T. Konczal	Previous counsel of record	Application for the LINKEDNETS Mark; selection of www.linkednets.com and related domains.
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II. RELEVANT UNPRIVILEGED DOCUMENTS (FED. R. CIV. P. 26(a)(1)(A)(ii)).

Subject to the qualifications set forth above, TorridRed Inc. discloses the following categories of documents, data compilations, and tangible things that are in its possession, custody, or control and that it may use to support its claims. The documents are located at (a) the offices of TorridRed Incorporated, 5616 Woodhaven Court Plano, Texas 75093 and/or (b) Howison & Arnott, L.L.P. Two Lincoln Centre, 5420 LBJ Freeway, Suite 660 Dallas, Texas 75240-2318:

1. Copies of TorridRed Inc.'s application for the LINKEDNETS Mark to the United States Patent & Trademark Office ("USPTO"), publicly available and also located with TorridRed Inc.;
2. Correspondence between TorridRed Inc. and Opposer relating to the claims asserted in this action, located with TorridRed Inc. and Opposer;
3. Screenshots of TorridRed Inc.'s websites, www.linkednets.com and subpages, publicly available and located with TorridRed Inc. and Opposer;
4. Documents relating to the selection of and application for registration of the LINKEDNETS Mark, located with TorridRed Inc.

TorridRed Inc. notes that the initial disclosures required by Fed. R. Civ. P. 26(a)(1)(A)(iii) (relating to computation of damages) and Fed. R. Civ. P. 26(a)(1)(A)(iv) (relation to insurance agreements are not applicable to this proceeding.

Dated: April 7, 2011

HOWISON & ARNOTT, L.L.P.
GREGORY M. HOWISON (TX 10121550)
JOHN J. ARNOTT (TX 00790240)

By: 

Gregory M. Howison

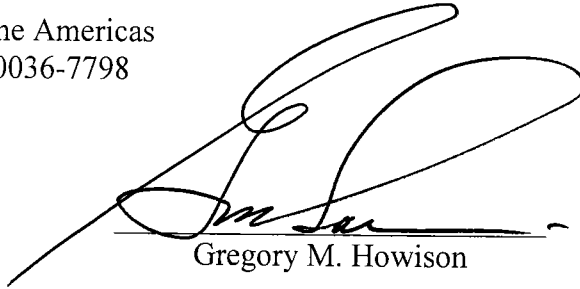
Attorneys for Applicant.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing TorridRed Inc.'s Initial Disclosures was mailed, first-class postage prepaid, to counsel for Opposer:

Janet L. Cullum
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Date: April 7, 2011



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